



Leaders in Public Safety Communications™

EXECUTIVE DIRECTOR

Derek K. Poarch
poarchd@apcointl.org

HEADQUARTERS

351 North Williamson Boulevard
Daytona Beach, FL 32114-1112
Phone: 386-322-2500
apco@apcointl.org
www.apcointl.org

OFFICE OF EXTERNAL RELATIONS

1426 Prince Street
Alexandria, VA 22314
Phone: 571-312-4400

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March 14, 2012

Rear Admiral Jamie Barnett (Ret.)
Chief, Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 99-87


Dear Admiral Barnett:

Section 6103 of the Middle Class Tax Relief and Job Creation Act of 2012 (“the Act”) requires that, within nine years, the Commission reallocate and auction spectrum in the 470-512 MHz band (the “T-Band”) currently used by public safety entities who will then have two years to relocate from the band. Auction proceeds will be used to pay the cost of the relocation. As you know, public safety and other land mobile radio licensees in the T-Band, as well as other portions of the UHF and VHF bands, are also subject to the Commission’s requirement that they convert to “narrowband” operations no later than January 1, 2013. The purpose of the narrowbanding requirement is to produce additional channels for new or expanded land mobile radio operations. However, Section 6103 of the Act creates a substantial disincentive for a entities to deploy new facilities in the T-Band as they would be required to relinquish their radio systems within eleven years. Therefore, a substantial question arises as to whether it is still in the public interest to require public safety T-Band licensees to go through the expensive and disruptive process of converting to narrowband operations.

APCO International continues to support the narrowbanding rules as a means of improving spectrum efficiency in the UHF and VHF bands. However, we recommend that the Commission consider modifying its rules, or adopting an expanded waiver policy, to relieve public safety licensees in the T-Band from any obligation to narrowband their existing radio systems. Some may still choose to proceed as part of planned system upgrades, but forcing them to do so provides no meaningful public benefit.

We hope that the Commission will give prompt consideration to this important issue. We look forward to working with you on this and related public safety communications matters.

Respectfully submitted,

A handwritten signature in blue ink, reading "Gregory T. Riddle". The signature is written in a cursive style with a large, stylized "G" and "R".

Gregory T. Riddle, President